

## REMARKS

The allowability of claims 7, 8, 12-14 and 20 is noted with thanks. Claims 2, 3 and 10 have been rewritten in independent form to secure their allowance, as well.

Claim 1 is rejected as anticipated over Meynier '952. The '952 device uses casing 2 that has a side pocket mandrel or cavity 6 with a plug 7 at the bottom. The connecting part 9 is lowered on a cable 10. It has a finger 11 with a socket 12 at the end that is guided into plug 7 in cavity 6.

Claim 1 requires a tubular with at least one auxiliary cable or conduit running along the tubular's length from the surface to be run in and connected on a subsequent trip to the downhole assembly and the auxiliary cable or conduit to be tagged into the connection on the downhole assembly for its conduit or cable. The '952 runs a cable, not a tubular that extends to the surface. The cable supports essentially the connection or finger 11 so it can go into the cavity 6. Accordingly, what the '952 doesn't do that claim 1 does do is make up a tubular running from the surface to a downhole assembly while also connecting an auxiliary cable or conduit to a connection on the downhole assembly, in a separate run. The cable 10 of the '952 is not a tubular. It is not tagged into anything as it runs inside tubing from the surface. This reference does not deal with the issue of the present invention. That issue is how to tag into a downhole assembly with a tubular run from the surface while also connecting an auxiliary cable or conduit run down to the downhole assembly on the tubular.

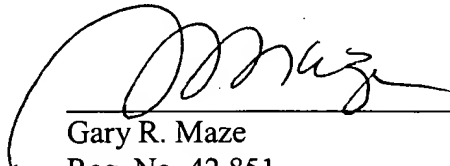
The Crawford '004 patent is similar to the '952 reference. Here a wireline 32 is used to run a connection through already connected production tubing 12 (Column 4 Lines 22-27). It too does not tag into a downhole assembly on a separate run with a tubular from the surface and an

auxiliary cable or conduit on the tubular so that the downhole assembly is tagged into by the tubular and the auxiliary conduit is connected to a connection on the downhole assembly.

For the reasons given above, the combination of the '004 patent with Pringle does not render claim 9 obvious.

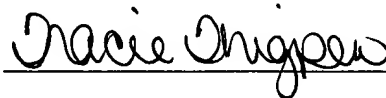
Respectfully submitted,

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